National Workload Assessment Pilot
For
Himco Dump
By
Gwendolyn Massenburg

(1) Estimate how many work years you (and any previous RPMs for the site has spent on the site since the beginning of its RI/FS (or RI/FS negotiations).
I calculated the following percentage by dividing the number of hours billed to the site per pay period divided by 2080 (the number of work hours in a year) and multiplied that number by 100 to get a percent of time spent during a particular year, for example 200 hours billed to the site in 1995 = 200/2080 = 0.0961528 x 100 = 9.6% of time spent on the site during that calendar year.

Lance Roberts: RPM
1989 - 1991 as a fund lead site, RI/FS negotiation, thru the proposed plan:

- 22% of the work year was spent on the site during 1989;
- 58% of the work year was spent on the site during 1990;
- 18.1% of the work year was spent on the site during 1991; and
- 11% of the work year was spent on the site during 1992.

Mary E. Gustafson: RPM
1992 - 1993 as a fund lead site; 1993 ROD was written

- 25% of the work year was spent on the site during 1992;
- 14% of the work year was spent on the site during 1993; and
- 2.6% of the work year was spent on the site during 1994.

Turpin Ballard: RPM
1994 – 1998 as a fund lead site, 1993 ROD, and NPL listing challenged by PRP to HQ; Pre-design studies conducted, discovered land in the Construction Debris Area (CDA) owned by private citizens, 1993 ROD remedy would take part of the private citizens' land. EPA began to ascertain the need for a ROD Amendment to change remedy so that the private citizens' land would not be taken in the CDA clean up. Vapor Intrusion to indoor air was not investigated during RI/FS. RA negotiations broke down due to human health risk assessment and 1993 remedy selection. PRPs petitioned HQ to remove site from NPL.

- 2.5% of the work year was spent on the site during 1994;
- 12% of the work year was spent on the site during 1995;
- 9% of the work year was spent on the site during 1996;
- 18% of the work year was spent on the site during 1997; and
- 5% of the work year was spent on the site during 1998.

Sheila Sullivan: RPM
1998 – 1999 as a fund lead site the Supplemental Site Investigation was beginning at the Site a lot of time was spent reviewing and trying to fix the USACE work plan, sending out access letters, talking to residents, coordinating with USACE, and assisting with the sampling in order

to complete everything before winter. The soil gas sampling required additional investigation and sampling work.

- 1% of the work year was spent on the site during 1998; and
- 11% of the work year was spent on the site during 1999.

Gwendolyn Massenburg: RPM

1999 – Present as a fund lead site the Supplemental Site Investigation had to be expanded to include a two rounds of private well water sampling, and two rounds of soil gas sampling. A new proposed plan and ROD Amendment was developed due to the new data collected during the Supplemental Site Investigation. I had to recreate the Enforcement history of the site for DOJ. EPA began RD/RA negotiations with PRPs for the 2004 Amended ROD. Reached an agreement in principle, and we are currently in discussion with the PRPs regarding the terms of the redline CD and SOW they submitted to us.

- 20% of the work year was spent on the site during 1999;
- 29% of the work year was spent on the site during 2000;
- 17% of the work year was spent on the site during 2001;
- 26% of the work year was spent on the site during 2002;
- 35% of the work year was spent on the site during 2003;
- 35% of the work year was spent on the site during 2004; and
- 25% of the work year was spent on the site during 2005.

(2) Estimate how many work years you will spend on this same site thru construction completion and five years into post construction. I propose that at least 30% of the work year for the next five years will be expended on this site for the remainder of the project, which includes construction completion and five years into post construction.

(3) Estimate how many contractor work years (non-construction) have been spent on the site and how many will be spent in the future: if you have any insight...as it relates to your site.

- For the RI/FS that let to the 1993 ROD, 3.5 years of non-construction work;
- For the Supplemental Site Investigation 2.0 years of non-construction work; and
- For post Amended ROD, 3 months of non-construction work.
- For future non-construction work, I propose 1.5 years.

(4) A thoughtful narrative analysis...with "quantification"...as to what factors contributed to consuming massive amounts of work years...over the years...and, if applicable, will continue to consume FTE in the future.

Himco Dump was an unlicensed landfill of approximately 60 acres in size; it consists of 11 distinct land parcels. Some of the parcels were owned by the generators, and operators of the landfill. Although the site has viable PRPs they were quite recalcitrant .This site was placed on the NPL and was petitioned by the PRPs by way of HQ to have this site removed from the NPL and the 1993 ROD was met with enormous opposition from the PRPs. The 1993 ROD remedy called for a RCRA Subtitle C cap with an active gas collection system. So much opposition from the PRPs was raised regarding the proposed remedy that the human health risk assessment was evaluated by HQ personnel. The lead owner generator made it difficult to move forward with the project. For instance they would submit a work plan to perform the supplemental work and

for some unknown reason the work plan was never implemented. An IAG was put in place to do the work, which the PRPs submitted a work plan to do, but was never implemented. The other thing that may have contributed to consuming massive amounts of work years could have been contributed to the number of RPM associated with the site. With each RPM having to go through the volumes of site history each time they received the site it had to consume a lot of time. However, based on the recommendation from HQ regarding the risk assessment and other issues that happened during other RPMs tenure, a ROD Amendment was necessary. Although the 1993 ROD would have addressed the site related issues, regarding the soil gas and the contaminated ground water migrating from the site. The PRP's argument was another remedy could be as effective without the RCRA subtitle C cap, and the active gas collection system. Especially when the RI/FS stated that there was not a direct contact health hazard associated with the landfill proper. And the other argument raised was that there was no data collected to warrant an active gas collection system at the site. Therefore, data was collected to demonstrate the need or lack thereof of the active gas collection system. While gathering the data for the soil gas it was discovered that residents living adjacent to the landfill who were using ground water as there only potable water supply never had their water tested, which had to be done in order to get a more complete characterization of the site. Contamination above MCLs was detected at one residence, and the risk associated with drinking the ground water was greater than the acceptable risk range of $1x10^{-4}$ - $1x10^{-6}$ and a HI >1.0. The soil gas data, residential ground water data gap, and no direct contact threat from the landfill proper along with the land taking issues associated with the private property owners in the CDA, and the no further land use associated with the 1993 ROD, the issues were significant enough to warrant a ROD Amendment. Although we currently have an agreement in principle with the PRPs to do the RD/RA, we are in the process of reviewing the red line version of the CD from the PRPs desk and it has practically has been unacceptably rewritten. EPA waited for more than four months to receive a response PRPs. We are currently trying to meet with the PRPs to discuss the acceptable comments regarding the CD. It is anticipated that the RD/RA negotiations will be completed by September 2006.